

My crazy idea

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08/31/2012 12:59 PM

I don't even think fish consumption evaluations on a river mile scale inform the remedy. Literally, all we need is a tissue concentration that equals acceptable risk, and then a sediment concentration. In the remedy phase here, I don't see where spatial scale of fish consumption gets used at all, the issue simply becomes one of the areal extent of contamination greater than a PRG. The PRG is largely blind to species (though there is some relationship), and whether people are getting some of all of their fish from a small area.

So, I'll agree that fish consumption should be evaluated only assuming a multi-species diet, and that "recreational" fishers largely eat only fillet. I do argue that if assuming someone is eating a diet of different species, that a rate of 19.8 oz meals/month from an area the size of 1 mile is more than plausible. If we need resolution down to a 1-mile section, we do it by presenting the results of the SMB risks. We don't argue that anyone is eating only SMB, but that a diet at a specific tissue concentration, as a specific consumption rate, equals the risks shown by the SMB data. And data from carp, crappie, and bullhead from the same river mile are either higher or lower than what's measured in bass, and the risk from a multi-species diet would be correspondingly higher or lower. Cancer risks are based on combined adult+child, hazard based on child only, and infant risks as presented. Everything else goes away, including the consumption risks assuming single species diets of carp, bullhead, and crappie. How many hundreds of pages of tables is that? And none of it actually affects the FS. Well, except for the argument that 17.5 g/day represented a RME, and that leading to the determination that the no-action alternative was already protective. But c'mon, that was a non-starter anyway...